

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

)	
IN RE: DEALER MANAGEMENT SYSTEMS)	MDL No. 2817
ANTITRUST LITIGATION)	Case No. 1:18-CV-00864
)	
<i>This document relates to:</i>)	
)	Hon. Robert M. Dow, Jr.
ALL CASES)	Magistrate Judge Jeffrey T. Gilbert

**THE REYNOLDS AND REYNOLDS COMPANY'S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS PURSUANT TO SUBPOENA**

Defendant The Reynolds and Reynolds Company (“Reynolds”) respectfully moves this Court for an Order compelling nonparty Dominion Enterprises, Inc. (“Dominion”) to produce documents pursuant to Rule 45(d)(2)(B)(i) of the Federal Rules of Civil Procedure. In support of this motion, Reynolds submits the accompanying memorandum of law.

Pursuant to Local Rule 37.2, Reynolds certifies that it has met and conferred with Dominion's counsel in a good faith attempt to resolve the dispute presented by this motion. The first telephonic conference with Dominion's counsel took place on May 18, 2018. The participants were Leo D. Caseria for Reynolds and Marc Schildkraut for Dominion. The second telephonic conference took place on June 26, 2018 between Michael P.A. Cohen for Reynolds and Marc Schildkraut for Dominion. The third telephonic conference took place on July 19, 2018 between James L. McGinnis for Reynolds and Marc Schildkraut for Dominion. The final telephonic conference occurred on July 20 between Michael P.A. Cohen for Reynolds and Marc Schildkraut for Dominion. Counsel also conferred via email between May 22 and July 20, 2018, and confirmed that the parties had reached an impasse. The email correspondence participants were Leo D. Caseria, Michael P.A. Cohen, and James L. McGinnis for Reynolds, and Marc Schildkraut for Dominion.

Dated: July 23, 2018

Respectfully submitted,

/s/ Michael P.A. Cohen

Michael P.A. Cohen
SHEPPARD MULLIN RICHTER
& HAMPTON, LLP
2099 Pennsylvania Ave., NW, Suite 100
Washington, DC 20006
(202) 747-1900
mcohen@sheppardmullin.com

Aundrea K. Gulley
Kathy D. Patrick
Brian T. Ross
Brice A. Wilkinson
Ross A. MacDonald
GIBBS & BRUNS LLP
1100 Louisiana Street, Suite 5300
Houston, TX 77002
(713) 751-5258
agulley@gibbsbruns.com
kpatrick@gibbsbruns.com
bross@gibbsbruns.com
bwilkinson@gibbsbruns.com
rmacdonald@gibbsbruns.com

Leo D. Caseria
SHEPPARD MULLIN RICHTER
& HAMPTON, LLP
333 S. Hope St., 43rd Floor
Los Angeles, CA 90071
(213) 617-4206
lcaseria@sheppardmullin.com

Dylan I. Ballard
SHEPPARD MULLIN RICHTER
& HAMPTON, LLP
Four Embarcadero Center, 17th Floor
San Francisco, CA 94111
(415) 434-9100
dballard@sheppardmullin.com

*Counsel for Defendant The Reynolds and
Reynolds Company*

CERTIFICATE OF SERVICE

I, Leo D. Caseria, an attorney, hereby certify that on July 23, 2018, I caused a true and correct copy of the foregoing **THE REYNOLDS AND REYNOLDS COMPANY'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS PURSUANT TO SUBPOENA**, to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System. A copy of the foregoing will be served on non-party Dominion via hand delivery and a courtesy copy sent to Dominion's counsel via electronic mail.

/s/ Leo D. Caseria
LEO D. CASERIA
SHEPPARD MULLIN RICHTER
& HAMPTON, LLP
333 S. Hope St., 43rd Floor
Los Angeles, CA 90071
(213) 617-4206
lcaseria@sheppardmullin.com